

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Task Force Officer, Carlos R. Alcoba being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

I, Carlos Alcoba, employed as a Puerto Rico Treasury Department (Hacienda) and assigned as a deputized Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, having been duly sworn, do hereby depose and state as follows:

1. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7), that is, an officer of the United States empowered by law to conduct investigations and make arrests for violations of the offenses enumerated in Title 18, United States Code, Section 2516. I am currently assigned to the Bureau of Alcohol Tobacco, Firearms and Explosives (ATF) in San Juan, Puerto Rico, conducting investigations of federal firearms violations and other federal violations.
2. As a deputized Puerto Rico Treasury Department Agent with the ATF, I assist in conducting investigations into the unlawful possession of firearms. Through training, investigations and experience, I have taken part in cases relating to the trafficking of firearms, the use and possession of firearms by persons prohibited by law, and the possession of illegal firearms. I am familiar with, and have participated in various methods of investigations, including, but not limited to: electronic surveillance, physical surveillance, interviewing and general questioning of witnesses, use of confidential informants, use of cooperating witnesses, and use of toll records and subscriber information. I have also debriefed confidential informants and cooperating witnesses regarding the habits and practices of people engaged in the illegal trafficking of firearms.

Furthermore, I have conducted and participated in numerous investigations to include: crime scene investigations, collection of evidence, interviews and the execution of search warrants.

3. The details and information stated herein are a compilation of facts and events investigated by me and other Law Enforcement Officers, who investigated and confirmed their veracity or overseen their development. I have drafted this affidavit for the limited purpose of establishing probable cause for certain violations of law. Therefore, I have not included all of the facts of this investigation.
4. The details and information stated herein are based on my training, experience, and personal knowledge and compilation of facts and events investigated by me and other Law Enforcement Officers who investigated and confirmed their veracity or oversaw their development. I have drafted this affidavit for the limited purpose of establishing probable cause that a Yatziel FELICIE-REYES violated Title 18, United States Code, Section 922(g)(1) (possession of a firearm and ammunition by a convicted felon). Therefore, I have not included all the facts of this investigation.

#### **FACTS SUPPORTING PROBABLE CAUSE**

5. On March 17, 2024, at approximately 10:00am, ATF consulted a case with Agents from the Carolina Municipal Police Department (CMPD).
6. According to CMPD, in the morning of March 17, 2025, the CMPD officers were conducting preventative patrols in the area of Isla Verde Avenue in Carolina, PR. At approximately 5:00am., CMPD officers observed an individual, wearing a white tank-top, no footwear, driving a green in color Veloce gas scooter bearing Puerto Rico license plate 31087 and not wearing a helmet. The individual operating the scooter was later identified as Yatziel FELICIE-REYES. As FELICIE-REYES was operating the scooter agents observed him trying

to secure a firearm into his waistband.

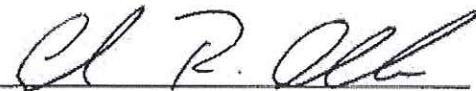
7. CMPD Officers attempted to conduct a traffic stop FELICIE-REYES over by activating the lights and sirens on their marked police cruiser meanwhile giving verbal commands to pull over through the speaker. FELICIE-REYES then accelerated and drove the gas scooter toward the direction of Luis Lloren Torres Public Housing Project. After a short distance on Isla Verde Avenue, Carolina, PR, FELICIE-REYES crashed the scooter into a police vehicle that was in front of him. FELICIE-REYES then attempted to flee the scene on foot. After running a short distance, FELICIE-REYES slipped and fell to the ground and was immediately apprehended by CMPD Officers.
8. During the search of FELICIE-REYES incident to arrest, CMPD officers recovered a Taurus, 9mm pistol, model G2C, bearing serial number TLW94185 from his waistband. According to CMPD, the firearm was loaded with an extended magazine but containing only fifteen rounds of 9mm ammunition, to include one round in the chamber. CMPD Officers also recovered another, standard-size 9mm, pistol magazine from the left pant pocket of FELICIE-REYES.
9. Subsequent to the arrest, FELICIE-REYES was transported to the CMPD Headquarters in Carolina, PR. According to CMPD, FELICIE-REYES was Mirandized and signed his waiver of rights but invoked his right to an attorney.
10. Ultimately, CMPD Officers seized the following items from the incident:
  - One (1) Taurus, 9mm pistol, model G2C, bearing serial number TLW94185
  - Two (2) .9mm pistol magazines
  - 19 rounds of 9mm ammunition

11. The investigation further revealed that Taurus firearms as well as the ammunition seized are not manufactured in the commonwealth of Puerto Rico. Therefore, the aforementioned firearm and ammunition was shipped or transported in interstate or foreign commerce.
12. The investigation revealed that FELICIE-REYES was previously convicted of a crime punishable by imprisonment for a term exceeding one year.

**CONCLUSION**

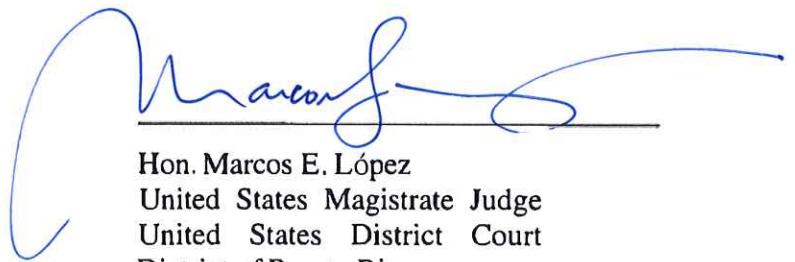
13. Based on the above facts, I respectfully submit there is probable cause to believe that Yatziel FELICIE-REYES violated Title 18, United States Code, Section 922(g)(1) (possession of a firearm and ammunition by a convicted felon).

I hereby declare, under penalty of perjury, that the information contained in this Affidavit is known to be true and correct to best of my knowledge.



Carlos R. Alcoba  
Taskforce Officer  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn before me pursuant to FRCP 4.1 at 5:39 PM by telephone, this  
17<sup>th</sup> day of March 2025.



Hon. Marcos E. López  
United States Magistrate Judge  
United States District Court  
District of Puerto Rico